

Case Name: Gonzalez Hernandez v. Sun Fish Inc. et al Case Number: 1:23 CV - 01246 (EK) (PK)**PROPOSED DISCOVERY PLAN/SCHEDULING ORDER**

	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	X		2/9/2024
2. Rule 26(a)(1) disclosures exchanged	N/A		
3. Requested:			
a. Medical records authorization		X	
b. Section 160.50 releases for arrest records		X	
c. Identification of John Doe/Jane Doe defendants		X	
4. Procedures for producing Electronically Stored Information (ESI) discussed		X	
5. Confidentiality Order to be submitted for court approval (see Standing Confidentiality Order on the Chambers website)		X	
B. SETTLEMENT PLAN			
1. Plaintiff to make settlement demand	X		12/8/2022
2. Defendant to make settlement offer	X		12/15/2023
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)	X		12/15/2023
4. Settlement Conference (proposed date)			
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings			3/15/2024
2. Initial documents requests and interrogatories			3/15/2024
3. All fact discovery to be completed (including disclosure of medical records)			6/14/2024
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			6/24/2024

5. Expert discovery (only if needed)		<i>Check here if not applicable</i> <input type="checkbox"/>	
Plaintiff expert proposed field(s) of expertise:	Not anticipated at this time, but Plaintiff reserves right to seek expert discovery upon conclusion of fact discovery		
Defendant expert proposed field(s) of expertise:			
	DONE	NOT APPLICABLE	DATE
a. Affirmative expert reports due			7/24/2024
b. Rebuttal expert reports due			8/26/2024
c. Depositions of experts to be completed			9/26/2024
6. Completion of ALL DISCOVERY (if different from C.3)			10/14/2024
7. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated			10/31/2024
8. If any party seeks a dispositive motion , date to (a) file request for pre-motion conference (if required), or (b) file briefing schedule for the motion			11/22/2024
9. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)			12/22/2024
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
2. All parties consent to Magistrate Judge jurisdiction for trial?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases		x	
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification		x	
a. Response due			
b. Reply due			

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

PEGGY KUO
 United States Magistrate Judge

 Date